

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ETHLOKIA PLUMBER, ex rel., K.W.	§	
	§	
<i>Plaintiffs,</i>	§	
v.	§	CIVIL ACTION NO. 4:20-CV-00672
	§	
HARRIS COUNTY DEPARTMENT	§	
OF EDUCATION,	§	
	§	
<i>Defendant.</i>	§	

DECLARATION OF SHILOH CARTER

I, Shiloh Carter, hereby declare as follows:

1. I am an attorney employed by Disability Rights Texas. I admitted to the State Bar of Texas.
2. Attached to this Declaration are Exhibits 1–3. These exhibits are exact duplicates of the original records maintained electronically by Disability Rights Texas in the ordinary course of business.

Exhibit 1: TEA Cypress-Fairbanks ISD Decision

Exhibit 2: TEA Notice of Closure to HCDE, Aug. 17, 2018

Exhibit 3: TEA Complaint against HCDE and Cypress-Fairbanks ISD Decision

3. Attached to this Declaration are Exhibits 4–8. These exhibits are duplicates of the cited portions deposition transcripts as reported by Veritext, including the cover page and Reporter’s Certificate.

Exhibit 4: Transcript of J. Parker Deposition (to be filed under seal)

Exhibit 5: Transcript of D. Jackson Deposition (to be filed under seal)

Exhibit 6: Transcript of M. Robertson Deposition (to be filed under seal)

Exhibit 7: Transcript of J. Colbert Deposition (to be filed under seal)

Exhibit 8: Transcript of J. Allen Deposition (to be filed under seal)

4. Attached to this Declaration are Exhibits 9–24. These exhibits are exact duplicates of records produced in discovery by Defendant Harris County Department of Education.

Exhibit 9: Contract between HCDE and Harmony Public Schools

Exhibit 10: D. Jackson CPI Training Record

Exhibit 11: Non-violent Physical Crisis Intervention Use Forms (to be filed under seal)

Exhibit 12: Event Participant Query: H. Allen Training

Exhibit 13: August 2018 CPI Training Log

Exhibit 14: KW IEP of Feb. 22, 2018

Exhibit 15: Video of Restraint, Feb. 26, 2018 (to be filed under seal)

Exhibit 16: 3-1-18 Incident Report

Exhibit 17: Student Handbook Restraint Policy

Exhibit 18: Student Handbook Appendix Board Restraint Policy

Exhibit 19: Witness Statements

Exhibit 20: 2-26-18 Restraint Form

Exhibit 21: Allen Termination Memo

Exhibit 22: J. Alexander Termination Memo

Exhibit 23: Record of Communication with Parent

Exhibit 24: Medical Referral

Exhibit 25: CPI Risk of Restraints

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 4th day of June 2021, at Houston, Texas.

DocuSigned by:

6D414211A693453...
Shiloh Carter